

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Periodic Reporting
(Proposal Two)

Docket No. RM2018-5

PUBLIC REPRESENTATIVE MOTION
FOR ISSUANCE OF INFORMATION REQUEST

(June 13, 2018)

Pursuant to 39 C.F.R. § 3001.21(a) and 39 C.F.R. § 3007.3(c), the Public Representative requests that an Information Request be issued to obtain additional clarifying data and information from the Postal Service concerning the proposed changes to analytical methods relating to the sampling procedure for the city carrier portion of the In-Office Cost System (IOCS), labeled as Proposal Two.¹ The proposed questions seek information that will allow participants to provide more constructive comments and evaluate whether the proposal meets applicable legal and regulatory requirements. Obtaining this information will also contribute to a better understanding of how the Postal Service has interpreted Commission rules and allow the Commission to make a fully informed, reasoned determination on whether Proposal Three meets applicable legal and regulatory requirements, including 39 U.S.C. § 3652(e)(2) and 39 C.F.R. part 3050.

Proposed Questions

1. Please refer to Library Reference USPS-RM2018-5/1, file "Prop.2.IOCS.Cluster.Impact_Public.xlsx." For all hardcoded numbers in columns D-E, G, N-O, and U-V, please provide direct links or references to the input data files.

¹ Petition of the United States Postal Service for the Initiation of a Proceeding to Consider Proposed Changes in Analytical Principles (Proposal Two), May 25, 2018 (Petition).

2. The Postal Service states that for morning tests, the frame for the first-stage sampling “is the set of delivery zones and facilities with at least one city carrier route.” Petition, Proposal Two at 19. Please indicate the percentage and/or actual number of delivery zones and facilities in the network that do not have any city carrier routes.
3. The Postal Service states that “large zones have six or more city carrier routes.” Petition, Proposal Two at 19.
 - a. Please provide the overall number of large zones in the network and indicate the proportion of zones with more than six routes.
 - b. Please indicate the maximum number of routes in a zone.
4. The Postal Service states that for morning tests, “[t]he number of workhours recorded in DOIS in the preceding four weeks is used to order the [large] zones, and a systematic random sample is drawn to select zones in proportion to the number of hours.” Petition, Proposal Two at 19.
 - a. Please explain the reasons for choosing systematic random sampling, rather than simple random sampling or stratified random sampling.
 - b. Please specify the sampling interval and sample size selected for systematic random sampling.
 - c. Please explain why the Postal Service relies on the data for the four-week period.
5. The Postal Service states that for morning “large-zone tests, the [IOCS Computerized On-Site Data Entry System] software randomly selects six carriers from the set of available carriers.” Petition, Proposal Two at 19-20. Please explain the reasons for choosing a sample size of six carriers and include any applicable statistical documentation with your response.

6. The Postal Service provides “the proposed numbers of tests by each sampling mode, and the projected number of non-stop readings that are expected from each mode.” Petition, Proposal Two at 8. Please also provide the total number of annual carrier readings (including stop readings) that the Postal Service anticipates to obtain under the proposed IOCS-cluster design.
7. Please provide the IOCS data collector instructions for the data collection and sampling methodology for the proposed IOCS-cluster statistical design. See, Petition, Proposal Two at 5-7, 17-21.
8. Please refer to Appendix A to Proposal Two that provides the IOCS-Cluster documentation² and to the IOCS documentation filed with the Annual Compliance Report (ACR).³ Please provide updated IOCS documentation that reflects the IOCS-Cluster documentation subject of Proposal Two.
9. The Postal Service states that variances and coefficients of variation (CVs) “are not available at this time.” Petition, Proposal Two at 9. Please indicate when the Postal Service expects variances and CVs become available.
10. The Postal Service indicates that Proposal Two will improve data quality and data collection efficiency. Petition, Proposal Two at 1-2. The Postal Service also maintains that “IOCS-cluster has a much higher sampling efficiency.” *Id.* at 8. Please explain how the Postal Service measures the levels of data quality, data collection efficiency and sampling efficiency. Please include any applicable statistical documentation with your response.

² Appendix A: In-Office Cost System: Cluster (IOCS-Cluster) Statistical Documentation. See Petition, Proposal Two at 17-25.

³ Docket No. ACR 2017, Library Reference USPS-FY17- 37, file “USPS-FY17-37.Preface.pdf.”

11. The Postal Service notes that “the vast majority of parcels delivered on Sundays and [h]olidays in FY 2017 were Parcel Select,” and proposes to make the costs accrued for city carriers on Sundays and holidays 100 percent attributable.

Petition, Proposal Two at 9.

- a. Please indicate the percentage of parcels delivered on Sundays and holidays in FY 2017 that were not Parcel Select.
- b. Please confirm that the Postal Service delivered only parcels on Sundays and holidays in FY 2017. If not confirmed, please describe the delivered mail products and provide their shares in the overall mail volume delivered on Sundays and holidays.

12. The Postal Service states that in the afternoon, “carriers are typically not handling mail” and that “telephone readings can continue to be an adequately reliable (as well as cost-efficient) approach.” Petition, Proposal Two at 11.

Please indicate the difference in the total annual or daily costs associated with the obtaining the IOCS city carrier readings between the current and proposed methodologies.

Respectfully submitted,

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